

THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

In re:

Chapter 7

LOOKIN UP ENTERPRISES, INC.

Case No.: 8:17-bk-08036-MGW

Debtor.

**AMENDED MOTION FOR RELIEF FROM AUTOMATIC STAY**

COMES NOW the Creditor/Movant, ZLATAN ZEKIC, by and through the undersigned attorney, and moves this Honorable Court for relief from stay pursuant to 11 USC § 362(d) and states as follows:

1. This action is brought pursuant to 11 USC § 362(d), for the purpose of obtaining relief from the automatic stay as provided in the Bankruptcy Code.

2. On or about September 18, 2017, the Debtor, LOOKIN UP ENTERPRISES, INC., filed a Voluntary Petition for Discharge pursuant to Chapter 11 of the Bankruptcy Code.

3. The Movant, ZLATAN ZEKIC, by and through the

undersigned counsel, is listed as a creditor of the Debtor under Schedule E/F of the Voluntary Petition for Discharge.

4. The Movant, ZLATAN ZEKIC, seeks to avail himself of the proceeds of a liability insurance policy owned by the Debtor, LOOKIN UP ENTERPRISES, INC.

5. Coverage is unknown at this time as to the amount and provider due to a failure to disclose. However, it is known that an investigation was undertaken and thus some coverage was in existence.

6. On or about July 3, 2016, the Movant, ZLATAN ZEKIC, was injured in a boating incident in Pinellas County, Florida, caused by the negligence of the Debtor in the course and scope of its business.

7. As a result of the injury occurring from the aforementioned boating accident, the Movant has sustained medical expenses, lost earning capacity, physical infirmity, pain and suffering, and other damages.

8. Furthermore, the Movant, ZLATAN ZEKIC, knows of no other claims or potential claims which would be affected by the diminution of funds available under the subject liability policy.

9. The granting of this Motion will not adversely affect the rights of the Debtor, creditors, or potential creditors.

10. The Debtor's liability insurance policy is not necessary for an effective reorganization.

WHEREFORE, the Movant, ZLATAN ZEKIC, prays to this Honorable Court for relief in the form of an Order amending and/or modifying the previous automatic stay of this Court in the above-styled action, which Order would allow the Movant herein to determine what insurance policy may provide coverage for his loss and be compensated by the aforementioned liability insurance policy, and for such other and further relief as this Court deems just and proper.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Motion for Relief from Stay has been furnished either by electronic or standard first class mail to the parties listed below on this 27<sup>th</sup> day of July, 20 18.

  
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J. EMORY WOOD, ESQUIRE

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